

EXHIBIT A

From: [Austin P. Brane](#)
To: [Andrew Campbell](#)
Cc: [Jon Kieffer](#); [Angela Priest](#)
Subject: FW: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation, MDL No. 3047 – Plaintiff Fact Sheet
 Deficiency Notice – Missing Plaintiff Fact Sheet

Counsel,

With regard to the PFS for plaintiff The School Board of Polk County, Florida, we were advised late yesterday that the individual in charge of preparing and finalizing the PFS was unexpectedly called away from the office due to a death in the family, and that the completed PFS should be forthcoming within the next few days. We are continuing to follow up with them. If you think it would be helpful, we could be available to confer on this issue tomorrow or Thursday. Thank you.

Regards,
 Austin

From: MDL Centrality – Social Media <socialmedia@browngreer.com>
Sent: Tuesday, April 2, 2024 2:38 PM
To: Joan Toomey <jtoomey@wcllp.com>; Angela Priest <apriest@wcllp.com>; Lucy Malone <lmalone@wcllp.com>; Peggy Bradshaw <pbradshaw@wcllp.com>; Shauna M. Gibson <sgibson@wcllp.com>; Becky Dacus <bdacus@wcllp.com>; Lizbeth J. Goodrum <lgoodrum@wcllp.com>; mkauffman@wcllp.com; dpickney@wcllp.com; Austin P. Brane <abrane@wcllp.com>
Cc: MDL Centrality – Social Media <socialmedia@browngreer.com>
Subject: [EXTERNAL] Social Media Adolescent Addiction/Personal Injury Products Liability Litigation, MDL No. 3047 – Plaintiff Fact Sheet Deficiency Notice – Missing Plaintiff Fact Sheet

04/02/2024

VIA MDL CENTRALITY

Wagstaff & Cartmell, LLP
4740 Grand Ave., Suite 300
Kansas City, MO 64112

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation, MDL No. 3047 – Plaintiff Fact Sheet Deficiency Notice – Missing Plaintiff Fact Sheet

Counsel,

I write on behalf of the Defendants in MDL No. 3047. We did not receive a Plaintiff Fact Sheet (“PFS”) from the plaintiffs listed below by April 1, 2024, as ordered by the Court.

Plaintiff Name	PID	Firm
The School Board of Polk County, Florida	2069	Wagstaff & Cartmell, LLP

In light of the accelerated timeline contained in the Pretrial Schedule of the Court’s Case Management Order 10 (Dkt. 604) (February 8, 2024)—including the April 15, 2024 deadline to make bellwether picks—and Plaintiffs’ counsel’s repeated assurance to the MDL Court that all School District Plaintiffs would serve substantially complete PFSs by April 1, please immediately confirm whether these plaintiffs intend to pursue this case. If not, the case should be dismissed; if so, please upload a fully completed PFS to MDL Centrality in this case by no later than 5:00 p.m. PT today. If we do not receive

the fully completed PFS by that time, we plan to escalate this issue to the Court.

Defendants reserve all rights to supplement or amend this notice, or to serve a new deficiency notice, after Defendants receive the PFS, and to seek any and all appropriate relief with the MDL Court.

Please contact us if you wish to discuss any of the above.

Sincerely,

/s/ Andrew L.

Campbell

Andrew L. Campbell

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